

**UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF TEXAS
HOUSTON DIVISION**

JOHN DEREK LAGWAY,
Plaintiff,

V.

**CITY OF CONROE, TEXAS, OFFICER
BRENT STOWE AND OFFICER ERIC
BURKE, INDIVIDUALLY**
Defendants.

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CAUSE NO. 4:09-CV-01732
JURY REQUESTED

DEFENDANT'S PROPOSED VOIR DIRE QUESTIONS

TO THE HONORABLE UNITED STATES DISTRICT JUDGE:

COMES NOW, the Brent Stowe, Defendant in the above-titled number cause and files this list of proposed voir dire questions in accordance with the pre-trial requirements of this Court and for same will show the Court as follows:

1. Has any member of the jury panel or any member of your immediate family (defined as husband or wife, parents and children) even been a Plaintiff in a personal injury lawsuit?
2. Has any member of the jury panel or any member of your immediate family ever had any type of unpleasant experience cause by a police officer or law enforcement agency?
3. Would that experience tend to make you think less of police officers or police departments?
4. Has any member of the jury panel or any member of your immediate family ever been injured in any way by a law enforcement agent or suffered any type of injury in any type of incident with a law enforcement agency?
5. Has any member of the jury panel ever had any type of unpleasant experience or trouble with any employee, agency or department of the City of Conroe?
6. If you have had an unpleasant experience with an employee, agency or department of the City of Conroe, what was that experience?

7. Would that experience tend to make you think less of the City of Conroe or any of its officials or employees?
8. Has any member of the jury panel or a member of your immediate family ever filed a claim or lawsuit against the City of Conroe?
9. Has any member of the jury panel or any member of your immediate family ever filed a claim or lawsuit against a city for any reason?
10. Has any member of the jury panel or any member of your immediate family ever filed a claim or lawsuit against a law enforcement agent or agency of any kind?
11. Has any member of the jury panel read, seen or heard and report, article or comment about this case?
12. If so, what have seen, read or heard?
13. With what you have read, seen or heard would that tend to make you biased or prejudiced against either party with regard to this matter?
14. Is any member of the jury panel or any member of your immediate family an officer, director or active member of Amnesty International or the ACLU?
15. Does anyone on the jury panel regularly read the Houston Press?
16. Does anyone on the jury panel know the attorney for the Plaintiff, Randall L. Kallinen?
17. Does anyone on the jury panel know the Plaintiff John Derek Lagway, his mother, Eddie Lagway, or his wife, Niketa Lagway?

Respectfully submitted,

GORDON & REES LLP

By: /s/ Steven D. Selbe
Steven D. Selbe
State Bar No. 18004600
So. Dist. No. 18003
Heidi Gumienny
State Bar No. 24036696

**ATTORNEYS IN CHARGE FOR
DEFENDANTS**

OF COUNSEL:

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CERTIFICATE OF SERVICE

I hereby certify that a true and correct copy of the foregoing instrument has been sent on 8th day of September, 2010, to counsel for the Plaintiff through the electronic filing system of the Southern District of Texas.

/s/ Steven D. Selbe
STEVEN D. SELBE